

HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MICHAEL WRIGHT and ALEXIS WRIGHT,
a married couple,

Plaintiff,

vs.

STATE FARM FIRE & CASUALTY
COMPANY, a foreign insurer,

Defendant.

Case No. 2:23-cv-00179-JNW

**DECLARATION OF HEATHER N.
DERENSKI IN SUPPORT OF
PLAINTIFFS' MOTION FOR PARTIAL
SUMMARY JUDGMENT**

1. I am over the age of eighteen and competent to testify. I am Plaintiffs' counsel in this case. This declaration is based on my personal knowledge.

2. Attached are true and correct copies of:

- a) **Exhibit 1:** Select pages of State Farm's claim file notes
- b) **Exhibit 2:** Select pages of the Deposition of Alexis Wright
- c) **Exhibit 3:** Certified Insurance Policy
- d) **Exhibit 4:** Select pages of the FRCP 30(b)(6) Deposition – Witness Christina Jalali
- e) **Exhibit 5:** Plaintiffs' Supplemental Discovery Responses 10/25/24

DECLARATION OF HEATHER N. DERENSKI ISO
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108 UNION AVENUE
SNOHOMISH, WA 98290
(425) 460-0080

- f) **Exhibit 6:** Select pages of the Deposition of Tim Treat
- g) **Exhibit 7:** Letter of 01/27/22 with State Farm Estimate 01/26/22
- h) **Exhibit 8:** Select Pages of the Deposition of Kyle Rice Part 1
- i) **Exhibit 9:** Select Pages of the Deposition of Kyle Rice Part 2
- j) **Exhibit 10:** Select Pages of the Deposition of Michael Wright
- k) **Exhibit 11:** Email of 07/21/22 from Wright with Estimate + Sub Bids
- l) **Exhibit 12:** Letter of 08/04/22 regarding supplemental payment
- m) **Exhibit 13:** Letter of 08/29/22 regarding status
- n) **Exhibit 14:** Select Pages of the Deposition of Danette Leonhardi
- o) **Exhibit 15:** Letter of 08/30/22 from State Farm to Wright
- p) **Exhibit 16:** Letter of 09/22/22 to State Farm
- q) **Exhibit 17:** Letter of 10/12/22 from State Farm
- r) **Exhibit 18:** Letter of 10/21/22 to State Farm
- s) **Exhibit 19:** Insurance Fair Conduct Act Notices
- t) **Exhibit 20:** Email to Defense Counsel of 02/10/23
- u) **Exhibit 21:** Email chain of 07/18/22
- v) **Exhibit 22:** Select portions of the Transcript from March 26, 2026, Plaintiffs' Motion to Compel
- w) **Exhibit 23:** State Farm Code of Conduct
- x) **Exhibit 24:** State Farm Commitment to its Policyholders
- y) **Exhibit 25:** Email from Reinspector to Cypher

3. After Tim Treat acknowledged he would consider reviewing bank statements to prove the Wrights' incurred meal expenses while they stayed in the hotel, the Wrights

1 supplemented their discovery responses with bank statements proving the costs but they have not
2 been paid.

3 In October 2024, Plaintiffs received thousands of responsive discovery documents that
4 were due months earlier, of which over 900 pages were produced at the discovery cutoff.

5
6 I declare under penalty of perjury under the laws of the State of Washington that the
7 foregoing is true and correct.

8
9 DATED this 25th day of November 2024 in Snohomish, Washington.

10 s/Heather N. Derenski

11 Heather N. Derenski
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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury under the laws of the State of Washington that on November 25, 2024, I caused one true copy of the foregoing document with exhibits to be served in the manner indicated below:

Attorney for Defendant
State Farm Fire & Casualty Company
James D. Hicks
SINARS SLOWIKOWSKI TOMASKA LLC
221 1st Avenue W., Suite 200
Seattle, WA 98121 Seattle, WA 98119
(206) 705-2115
jhicks@sinarslaw.com

- ☐ U.S. Postal Service
- ☐ Facsimile
- ☐ E-Mail
- ☒ E-Service/ECF
- ☐ Hand Delivery
- ☐ Via Legal Messenger Service

DATED November 25, 2024, in Snohomish, Washington.

CEDAR VIEW LAW, PLLC

s/Heather N. Derenski
Heather N. Derenski, Attorney